

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CRAIGVILLE TELEPHONE CO. d/b/a
ADAMSWELLS; and CONSOLIDATED
TELEPHONE COMPANY d/b/a CTC.,

Plaintiffs,

v.

T-MOBILE USA, INC.; and
INTELIQUENT, INC.,

Defendants.

Hon. John Z. Lee

Case No. 1:19-cv-07190

INTELIQUENT, INC.’S MOTION FOR PRIMARY JURISDICTION REFERRAL

Inteliquent, Inc. (“Inteliquent”), respectfully moves to refer the claims against it to the Federal Communications Commission (“FCC”) under the doctrine of primary jurisdiction for the reasons set forth in detail in Inteliquent’s accompanying memorandum of law. This motion is made in the alternative to Inteliquent’s Motion to Dismiss the First Amended Class Action Complaint and only should be considered to the extent that motion is denied.

WHEREFORE, to the extent the Court does not dismiss the claims against Inteliquent pursuant to the motions to dismiss, the Court should refer the claims against Inteliquent to the FCC under the doctrine of primary jurisdiction.

Dated: January 15, 2020

Respectfully submitted,

By: /s/ John J. Hamill

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CERTIFICATE OF SERVICE

The undersigned attorney, on oath, certifies that on January 15, 2020, he served the foregoing **Motion for Primary Jurisdiction Referral** via the ECF system to all parties that have consented to same in accordance with applicable Federal Rules of Civil Procedure and Local Rules of the U.S. District Court for the Northern District of Illinois.

By: /s/ John J. Hamill

John J. Hamill